REMARKS

Claims 1-6 are pending in this application. Claim 1 is the only independent claim.

By this amendment, claims 1, 3 and 6 are amended.

Reconsideration in view of the above amendments and following remarks is respectfully solicited.

The Claims Define Patentable Subject Matter

The Office Action rejects:

(1) claims 1-5 are rejected under 35 U.S.C. §103(a) as being unpatentable over European Patent No. EP 0 949 571 A2 by Bickmore (hereafter Bickmore) in view of International Publication No. WO 00/39666 by Carlino et al. (hereafter Carlino) and further in view of European Patent Application EPO 0 938 052 A2 to Rossmann et al. (hereafter Rossmann); and

(2) claim 6 is rejected under 35 U.S.C. §103(a) as being unpatentable over Bickmore in view of Carlino in view of Rossmann and further in view of Nokia 5110 telephone User's Guide.

These rejections are respectfully traversed.

Applicant respectfully submits that the combination of Bickmore, Carlino and Rossmann fails to teach or suggest each and every feature as set forth in the claimed invention.

For example, the Examiner is attempting to use Rossmann to make up for the deficiencies found in both Bickmore and Carlino. However, applicant respectfully submits that Rossmann, like Bickmore and Carlino, also fails to teach or suggest the assignment of codes and an input section which uses buttons to input a desired code is apart of the hypertext display apparatus itself.

Specifically, in contrast with the present invention, Bickmore merely discloses (in Figure 7, for example) that a request for a document is sent from a limited display area device to a host node, and a re-authored page is later returned. Thus, Bickmore must use <u>both</u> a limited display area device and a host node to perform its functions.

Similarly, Carlino merely discloses (in Figure 1, for example) that a wireless device (12) sends a request to a wireless gateway (14) and later a converted response will be returned to the

wireless device. Thus, Carlino must use both a wireless device and a wireless gateway to perform its functions.

Furthermore, Rossmann merely discloses a similar configuration to Carlino (see Figure 3) wherein a mobile device 142 is in communication with server device 144. For example, Rossmann discloses in paragraph [0020], line 5 that a microcontroller 128 initiates a communication session request to a server device using a module 124. A HDML deck is then received from the server device. Thus, Rossmann must use both a mobile device and a server device to perform its functions.

Furthermore, applicant respectfully submits that each of Bickmore, Carlino and Rossmann fails to teach or suggest classifying the link information into "a plurality of groups."

Specifically, in the claimed invention, a link information classification section classifies the plurality of units of link information into a plurality of groups so that each group includes a prescribed number of units of link information. (see applicant's Fig. 4, for example).

In contrast with the present invention, Bickmore fails to classify the "extracted links" (from the images) into a plurality of groups, as claimed. Bickmore merely reformats the extracted hypertext image links into a single text list of link anchors, instead of "a plurality of groups" each having a prescribed number of links.

Similarly, Carlino also fails to disclose classifying the extracted links into a plurality of groups. Instead, Carlino merely discloses reorganizing the entire document into categories such as text, links and tables. In other words, Carlino merely discloses a plurality of categories for the contents of the entire document. However, Carlino fails to disclose a "plurality of groups" for the "extracted link information".

For example, as shown in Carlino's Fig. 7, a single group, entitled "LINKS", not a plurality of groups, is being used for the "extracted links". It appears that the Examiner is confusing "plurality of categories" for the entire document with the "plurality of groups for the extracted links". In Carlino, only the single group called "LINKS" includes all of the extracted link information. In Carlino, there is no other group for the extracted links. In contrast, in the present invention "a plurality of groups" (i.e., more than one) has link information contained therein.

Furthermore, the Examiner alleges that Carlino discloses on page 37, lines 12-24 classifying the links into a plurality of groups. (see Office Action, page 3). Applicant respectfully disagrees with this allegation.

Applicant respectfully submits that a close review of the cited sections of Carlino merely reveals that the original document is divided into general categories such as text, links, images, and tables. However, as noted above, Carlino only discloses having a single category (group) for the links, instead of a plurality of groups as claimed in the present invention. (see Carlino, Fig. 7).

For at least the reasons noted above, Applicant respectfully submits that the Examiner has failed to show how/where Carlino and/or Bickmore discloses classifying the extracted links into a plurality of groups.

Furthermore, in addition to Bickmore and Carlino, Rossmann also fails to teach or suggest classifying the extracted links into a plurality of groups.

For example, Rossmann merely discloses that a user can navigate from one deck to another by traversing hyperlinks that reference a desired deck, wherein a deck is simply a group of screen displays. A card includes the information required to generate a screen display on the display screen. There are four types of cards used, an entry card, a display card, a choice card, and a no-display card. Information or instructions are grouped into one or more HDML cards required to generate a screen display. A deck includes one or more such cards. A card can contain text and images. (see Rossmann, paragraphs [0020], [0025], [0030] and [0031]).

Furthermore, Rossmann discloses that the display card gives information to display to the user. A choice card displays a list of choices for the user. An entry card is used to obtain input data from the user. A no-display card is a hidden card not for the purpose of being displayed. (see Rossmann, paragraph [0030]).

However, although Rossmann discloses using the cards for displaying information and for displaying a list of choices, Rossmann fails to disclose classifying the extracted links into a plurality of groups, as set forth in the present invention. In fact, Rossmann is completely silent about such a feature.

Furthermore, the Examiner alleges that Rossmann discloses a display section for displaying a list of the prescribed number of units of link information included in a specific group of the plurality of groups on page 11, col. 1, lines 1-20. (see Office Action, page 3). However, Applicant has been unable to find such a teaching at the cited portions of Rossmann or at any place in Rossmann. Instead, Rossmann merely discloses displaying a list of choices (see Rossmann, Figs. 4A-4G and 6A-6C). However, the Rossmann list of choices are not necessarily associated with a list of link information. Rossmann fails to separate any link information from any other type of information and present a list of only the link information. Rossmann merely presents a list of all choices.

Applicant also respectfully submits that the Nokia 5110 User's Guide fails to make up for the deficiencies found in each of Bickmore, Carlino and Rossmann, as noted above.

To establish a *prima facie* case of Obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP 706.02(j).

Applicant respectfully submits that the Examiner has failed to establish a *prima facie* case of obviousness at least in part because the Examiner has failed to show how each and every feature is taught by the cited art.

Applicant also respectfully submits that the Examiner has failed to show any suggestion or motivation from either the references themselves or in the knowledge generally available to one of ordinary skill in the art why it would be proper to combine the cited references. Instead, the Examiner is merely relying on improper hindsight.

Applicant respectfully submits that independent claim 1 is allowable over the cited art for at least the reasons noted above.

As for each of the dependent claims not particularly discussed above, these claims are

also allowable for at least the reasons set forth above regarding their corresponding independent claims, and/or for the further features claimed therein.

Accordingly, withdrawal of the rejection of claims 1-6 under 35 U.S.C. §103(a) is respectfully requested.

Conclusion

In view of the foregoing, Applicant respectfully submits that the application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact Carolyn T. Baumgardner (Reg. No. 41,345) at (703) 205-8000 **to schedule a Personal Interview**.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment from or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §1.16 or under 37 C.F.R. §1.17; particularly, the extension of time fees.

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Respectfully submitted,

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